

# EXHIBIT B

## **EXHIBIT B**

### **PROPOSED SCHEDULE**

*(All dates should be scheduled from date of entry of the Preliminary Approval Order (“PAO”) – if a proposed date falls on a Saturday, Sunday or Holiday, the date assigned should be the next Court day.)*

**NOTICE DATE (¶14):**

100 days from Entry of POA.

**SETTLING PARTIES FILE PAPERS IN SUPPORT OF SETTLEMENT & CLASS COUNSEL IN SUPPORT OF FEE APPLICATION (¶15):**

30 days from Notice Date

**BAR DATE FOR OBJECTIONS & OPT OUTS (¶¶ 16(a) & 18):**

45 days from Notice Date.

**SETTLING PARTIES FILE RESPONSIVE PAPERS TO ANY OBJECTIONS (¶15):**

5 days prior to Final Approval Hearing Date.

**FINAL APPROVAL HEARING DATE (¶14):**

165 days from PAO.

\*If the Parties do not reach agreement on attorney fees and expenses, the times for expert disclosure and depositions relating to the attorney fee issues, and for Defendant to file its opposition to class counsel’s fee application, will be scheduled in accordance with the time frames set forth in the Preliminary Approval Order.